

EXHIBIT A

Kusch, Janet Owen

From: Shroff, Armeen Mistry <Armeen.Shroff@Troutman.com>
Sent: Thursday, March 9, 2023 10:31 AM
To: markdobronski@yahoo.com
Subject: Dobronski v. Family First Life, LLC et al., Case No. 2:22-cv-12039-DPH-JJCG

Dear Mark,

I represent defendants Khonsavan Vongdara, Shannon Adams, Donte Grant, Vanessa Isabel Powell, Dario Joseph Wickham, Emmanuel Chibuzor Igweh, and Vanina E. Bonnano in the above-referenced case. We have previously corresponded about this case.

I write to request your consent to a Motion to Dismiss pursuant to Rule 12(b)(6) that we intend to file on these defendants' behalf tomorrow. The legal bases for the motion are, among other things, that Plaintiff lacks Article III standing, fails to plead facts that would allow the Court to reasonably infer that Defendants utilized an automated telephone dialing system, and fails to sufficiently plead vicarious liability under the TCPA.

Please confirm whether you concur with this Motion. Should you wish to discuss further, we are available.

Thank you,
Armeen

Armeen Mistry Shroff

Associate

Direct: 248.359.7314 | Internal: 802-7314

armeen.shroff@troutman.com

Pronouns: she, her, hers

troutman pepper

Suite 1800, 4000 Town Center

Southfield, MI 48075-1505

troutman.com

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